

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
MICHAEL J. CHILLEEN, Cal. Bar No. 210704
3 mchilleen@sheppardmullin.com
650 Town Center Drive, 10th Floor
4 Costa Mesa, California 92626-1993
Telephone: 714.513.5100
5 Facsimile: 714.513.5130

6 Attorneys for Defendant,
RALPH LAUREN CORPORATION
7

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
10

11 RICHARD PAUL MERRELL, individually
and on behalf of all others similarly situated,
12

13 Plaintiff,

14 v.

15 RALPH LAUREN CORPORATION, a
Delaware Corporation; and DOES 1 to 10,
16 inclusive,

17 Defendants.
18
19
20
21
22
23
24
25
26
27
28

Case No. 4:23-cv-06669-HSG
Honorable Haywood S. Gilliam, Jr.

**STIPULATION AND ORDER
CONTINUING FACT DISCOVERY
CUTOFF**

Trial Date: None Set
Action Filed: December 28, 2023

1 Plaintiff Richard Paul Merrell (“Plaintiff”) and Defendant Ralph Lauren Corporation
2 (“Defendant”) (collectively, the “Parties”) submit this stipulation and proposed order to continue
3 the fact discovery cutoff date in this matter for a period of three (3) weeks to allow Plaintiff to take
4 the deposition of Sadiki Christie that has been unilaterally noticed prior to the discovery cutoff,
5 but when Mr. Christie is unavailable. The Parties’ stipulation is based on the following:

6 WHEREAS, on December 28, 2023, prior named class representative, Vivian Salazar
7 (“Salazar”), filed her class action complaint against Defendant;

8 WHEREAS, on May 23, 2024, Defendant filed its answer to Salazar’s complaint;

9 WHEREAS, on December 17, 2024, the Parties attempted to mediate this matter;

10 WHEREAS, the mediation was unsuccessful, thus, on January 21, 2025, the Court held a
11 case management conference and set the close of fact and expert discovery related to class
12 certification for July 1, 2025;

13 WHEREAS, on May 12, 2025, due to Salazar wishing to withdraw as named class
14 representative, the Parties submitted a joint statement regarding extending scheduling deadlines
15 and leave to file a proposed amended complaint;

16 WHEREAS, on May 21, 2025, the Court granted leave to file an amended complaint;

17 WHEREAS, on May 21, 2025, Salazar was replaced by Plaintiff in the First Amended
18 Complaint;

19 WHEREAS, on May 21, 2025, the Court reset the Parties’ deadlines and set the close of
20 fact and expert discovery related to class certification of August 12, 2025;

21 WHEREAS, on July 1, 2025, Plaintiff unilaterally noticed the deposition of Sadiki Christie
22 for August 11, 2025 and Defendant’s PMK (who is also Sadiki Christie) on certain specified
23 topics, for August 12, 2025, without first requesting Mr. Christie’s availability;

24 WHEREAS, Mr. Christie is unavailable on August 11 or 12 and will not be available for
25 deposition until the third week of August, as he is out of the country on vacation;

26 WHEREAS, the Parties have agreed that the PMK deposition and Mr. Christie’s
27 deposition can be taken on August 22, 2025 or August 25-29, 2025;

28

1 WHEREAS, good cause exists to extend the fact discovery deadline for class certification
2 because Mr. Christie is not available for deposition on the dates unilaterally noticed by Plaintiff.
3 Mr. Christie is only available at the end of August when he is back from his vacation.

4 WHEREAS, the extension will not impact the deadline for Plaintiff to file his motion for
5 class certification in October 2025.

6 WHEREAS, there is no prejudice to the Parties if the fact discovery deadline is extended 3
7 weeks.

8 WHEREAS, the Parties respectfully request the Court continue the discovery cutoff to
9 September 2, 2025 to allow Plaintiff to take the deposition of Mr. Christie.

10 **NOW THEREFORE THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

11 That the class certification discovery cutoff date of August 12, 2025, be continued to
12 September 2, 2025, to allow Plaintiff to take the deposition of Mr. Christie.

13 **IT IS SO STIPULATED**

14 Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that the
15 concurrence in the filing of the document has been obtained from each of the other Signatories.

16
17 Dated: July 21, 2025

18 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

19
20 By

/s/ Michael J. Chilleen

MICHAEL J. CHILLEEN

Attorneys for Defendant,

RALPH LAUREN CORPORATION

1 Dated: July 21, 2025

2 WILSHIRE LAW FIRM, PLC


3
4 By /s/ Thiago M. Coelho
5 Thiago M. Coelho
6 Attorneys for Plaintiff,
7 RICHARD PAUL MERRELL
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Pursuant to the stipulation of the Parties, the Stipulation Continuing Fact Discovery Cutoff For a Specific Deposition is **GRANTED**. The class certification discovery cutoff is continued to September 2, 2025, for the purpose of taking the deposition of Defendant's PMK and the individual deposition of Sadiki Christie.

IT IS SO ORDERED.

DATED: 7/23/2025



Honorable Haywood S. Gilliam, Jr.
UNITED STATES DISTRICT COURT